

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~WESTERN~~ DISTRICT OF PENNSYLVANIA

MODULE

Name and address of Plaintiff:

Marcel Dawson Q#24903  
Laurel Highlands, 5106 Blades, pme  
Somerset PA 15501

v.

Full name, title, and business address  
of each defendant in this action:

1 Harrisburg Police Dept  
123 Walnut St #217  
Harrisburg, PA 17101

2 Officer Jeremy J. Shortz  
123 Walnut St #217  
Harrisburg, PA 17101

Use additional sheets, if necessary  
Number each defendant.

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

I. Where are you now confined? Law/Somerset

What sentence are you serving? 3 1/2 - 10 yrs

What court imposed the sentence? Dauphin County Court of common pleas

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs NONE

Defendants NONE

2. Court (if federal court, name the district; if state court, name the county) and docket number

NONE

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JAN 22 2025

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3. Name of judge to whom case was assigned \_\_\_\_\_

4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)  
\_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Approximate date of disposition \_\_\_\_\_

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? \_\_\_\_\_

When? \_\_\_\_\_

Result: \_\_\_\_\_

III. What federal law do you claim was violated? due process,  
police brutality, excessive force, false imprisonment, never read mirandam rights

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

A. Date of event: 1/2023

B. Place of event: 2nd street Harrisburg, PA outside of Aroogas between locust & pine st

C. Persons involved—name each person and tell what that person did to you: On January 21, 2023 at and outside of Aroogas sports bar and grill, Harrisburg, PA police dept, officer Jeremy J. Shorz tackled me from behind breaking my leg in the process, without warning.  
① I was then hand cuffed and detained without being told why  
② I was never read my rights.  
③ I was then placed in a patrol wagon (police transportation vehicle) with a broken leg, and taken to the booking center on Main road.  
④ After being denied by booking center a ambulance was called. I was then placed in (EMS) vehicle and transported to Harrisburg Hospital where I was sedated and prepped for emergency surgery.

stating I the plaintiff am claiming the following:

- 1) excessive force,
- 2) police brutality,
- 3) violation of due process
- 4) false imprisonment
- 5) I was never read rights. (mirandam)

continued →

"Intentional Torts"

- 1) Reference of allegations, no probable cause to believe a crime was committed or committing.
- 2) Police had no probable cause to believe plaintiff had committed any crime.
- 3) Plaintiff suffered severe anxiety and psychological distress as a direct result of Defendants actions.
- 4) Defendants actions were reckless, wanton and outrageous.
- 5) Plaintiff suffered severe leg injuries that are debilitating and needed hospitalization.
- 6) Plaintiff suffered broken leg because of actions of Defendant.
- 7) Police's detention of Plaintiff was unlawful.
- 8) Plaintiff suffered financial damages as a result of police actions conduct, including but not limited to medical expenses.
- 9) Plaintiff also suffered permanent function of his leg mobility and use.
- 10) Plaintiff also suffered, extreme pain & suffering related to his hospitalization, together with psychological damages and severe shock to his nervous system.
- 11) Plaintiff also suffered bruises and contusions as a result of police actions in tackling him.
- 12) Police actions in tackling Plaintiff is constituted as Battery.
- 13) An arrest, whether with or without a warrant usually involves conduct which, unless privileged, is an "Assault" or "Battery" as well as "false imprisonment".
- 14) As a result of Plaintiff's injury he has been unable to undertake his normal duties and believes that he will continue to suffer impairments and disabilities, in the future which will result in his earnings and earning capacity.

[ Also § 11.9 claim against municipalities for damages resulting from police chase, and also allegations of negligence ]

Note: Harrisburg, PA city police later charged me with public drunkenness 2-6-23

V. Did the incident of which you complain occur in an institution or place of custody in this District?  
If so, where? \_\_\_\_\_

and answer the following questions:

A. Is there a prisoner grievance procedure in this institution?  
Yes  No

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?  
Yes  No

C. If your answer is YES,

1. What steps did you take? \_\_\_\_\_ N/A

2. What was the result? \_\_\_\_\_ N/A

D. If your answer is NO, explain why not: \_\_\_\_\_

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?  
Yes  No

F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

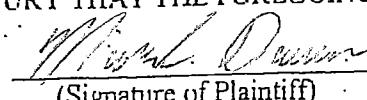
VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like 5 million \$, payment of future med bills, disability payment, compensation for pain and suffering, PISD, lost wages, past med bills, therapy

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

12-16-24  
(Date)

  
(Signature of Plaintiff)



PA DEPT OF CORRECTIONS  
INMATE MAIL

Smart Communications /PA DOC  
SCI - Laurel Highlands  
Marcel Dawson  
A.Q.2903  
PO BOX 33028  
5+ Petersburg FL 33733

Sylvia H. Rambo  
United States Courthouse, 101  
1501 North 6th Street Suite 101  
Harrisburg PA, 17102

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